

**REMARKS**

Claims 11-30 are pending.

Per the Examiner's request, the specification has been amended to delete the hyperlink.

Claims 11-30 have been rejected under 35 U.S.C. 102(e) as being anticipated by Alvares.

As demonstrated below, this rejection is not proper.

It is well settled that the Examiner bears the initial burden of establishing a *prima facie* basis to deny patentability to a claimed invention under any statutory provision. *In re Oetiker*, 977 F.2d 1443, 24 USPQ2d 1443 (Fed. Cir. 1992). Anticipation under 35 U.S.C. § 102 requires the disclosure in a single reference of each element of a claimed invention. *Minnesota Mining & Mfg. Co. v. Johnson & Johnson Orthopaedics, Inc.*, 976 F.2d 1559, 24 USPQ2d 1321 (Fed. Cir. 1992). In rejecting a claim under 35 U.S.C. § 102, it is incumbent upon the Examiner to point out specifically wherein an applied reference discloses each feature of the claimed invention. *In re Rijckaert*, 9 F.3d 1531, 28 USPQ2d 1955 (Fed. Cir. 1993); *Lindemann Maschinenfabrik GMBH v. American Hoist & Derrick Co.*, 730 F.2d 1452, 221 USPQ 481 (Fed. Cir. 1984). It is respectfully submitted that the Examiner did not discharge that burden.

In particular, claim 1 recites a system for protecting a computer device from unauthorized access, said protecting system being external with respect to the computer device and being connectable to a source of data to be provided to said computer device, said protecting system comprising:

a controller for processing said data to produce graphic information representing said data, the graphic information being produced in a graphic format inside said protecting system, and

an output buffer providing a path for transferring the graphic information to a monitor.

The Examiner did not point out specifically wherein Alvarez discloses each feature of the claimed invention, and which elements of Alvarez correspond to the claimed elements. Instead, the Examiner indicated that the complete claim language is disclosed in col. 3, line 35 through col. 4, line 16.

It is respectfully submitted that Alvarez in col. 3, line 35 through col. 4, line 16, does not disclose any system for protecting a computer device from unauthorized access, where the protecting system is external with respect to the computer device and comprises a controller and an output buffer configured in the manner recited in claim 1.

Instead, this portion of the reference describes computer systems shown in FIGS. 1a, 1b and 2.

The computer system in FIG. 1a includes processor and memory 102, and a DVD player 106 connected to the bus 110. Further, the system includes a graphics controller 107 connected to the bus 110, and a computer monitor 164 connected to the graphics controller 107.

As disclosed in the background section of Alvarez, this patent relates to protecting copyrighted content of a DVD disc from copying. The disc protection is provided using the Macrovision technology that involves an automatic gain control (AGC) circuit that applies gain to boost the level of a signal being transmitted to a TV set to a level acceptable for viewing.

The reference discloses that the graphics controller 107 produces RGB signal representing the signal read from the DVD by the DVD player 106. The RGB signal output is copyright protected using the Macrovision protection scheme.

The reference does not disclose that the computer system in FIG. 1a provides protection of any external computer device from unauthorized access, as claim 1 requires.

Instead, it encodes the signal from the disc to provide copyright protection. Even assuming that the Examiner takes the position that the computer system in FIG. 1a protects the DVD player 106 from unauthorized access, Applicant respectfully submits that the computer system is not connectable to a source of data to be provided to the DVD player 106, and does not process the data to be provided to the DVD player, to produce graphic information, as claim 11 specifically requires.

Instead, the system in FIG. 1 process data from the DVD player.

Moreover, the system in FIG. 1a does not have the claimed output buffer providing a path for transferring the graphic information to a monitor. The frame buffer 104 connected to the graphics controller does not provide a path for transferring the graphic information to the monitor 164.

Accordingly, the system in FIG. 1a does not anticipate the system recited in claim 11.

FIG. 1b shows the computer system in which the analog RGB output from the graphics controller is converted into a signal compatible with the TV set and the VCR.

This system also does not disclose that the graphics controller protects any computer device by processing data to be provided to this protected computer device to produce graphic information representing these data, as claim 11 requires.

FIG. 2 illustrates the computer system in which the graphic controller 108 receives pixel information from a video source, such as DVD player 106 (see col. 3, lines 62-64), to produce a signal transmitted to the computer monitor 164.

Hence, the system in FIG. 2 also does not protect any external computer device by processing the data to be provided to this protected computer device, as claim 11 requires.

Accordingly, Alvarez does not disclose the protection system of claim 11 within the meaning of 35 U.S.C. 102, *Minnesota Mining & Mfg. Co. v. Johnson & Johnson Orthopaedics, Inc., supra*.

Independent claim 22 recites a method of preventing unauthorized access to a computer device using a protection device external with respect to the computer device, the method comprising the steps of:

preventing data to be provided to the computer device from being supplied to the computer device,

supplying said data to the protection device, and

processing said supplied data to produce, inside the protection device, graphic information in a graphic format for supplying to a monitor.

As demonstrated above, Alvarez does not disclose preventing data to be provided to the protected computer device from being supplied to this computer device, and processing these data to produce, inside the protection device, graphic information in a graphic format, as claim 22 requires.

Also, Alvarez does not disclose the features recited in the dependent claims.

For example, claim 19 dependent from claim 11 recites that the controller is configured for replacing a name extension of a program file received from the source of data with another name extension.

The Examiner relies upon col. 3, line 35 through col. 4, line 16 (the portion of Alvarez discussed above in connection with independent claims 11 and 22) for disclosing these features. As discussed above, this portion of the reference does not disclose the controller configured for replacing a name extension of a program file received from the source of data with another name

extension. It is noted that the graphics controller of Alvarez does not receive any program file for processing.

Also, the Examiner relies upon this portion of Alvarez for disclosing the subject matter of claims 13, 15, 16, 17, 18, 20, 21, 25, 26, 27, 28, and 29. It is respectfully submitted that the rejections of these claims are unwarranted.

In view of the foregoing, and in summary, claims 11-30 are considered to be in condition for allowance. Entry of the amendment to the specification under 37 CFR 112 is respectfully requested because the amendment is made to comply with requirements of form expressly set forth in a previous Office Action. Favorable reconsideration of this application, as amended, is respectfully requested.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 500417 and please credit any excess fees to such deposit account.

Respectfully submitted,

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